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Deputy Comptroller

IFEB 1 1954

Acting Management Officer

Office of Comptroller Reports Management Program.

- 1. We consider the institution of a reports management program to be a highly desirable step. There is no doubt that uncontrolled reporting leads to duplication, preparation of inadequate material, and the continued preparation of reports for which the need has ceased to exist.
- 2. Paragraph 6 of the memorandum proposed to be issued by the Comptroller to prescribe the program provides that there shall be no report control symbol assigned to approved reports. We recommend that such symbols be assigned and carried on all approved reports. There will then be no question in the minds of reviewing officials as to the fact that the report is or is not approved. In addition there is of course, the matter of controlling the program and the reports control symbol is probably the best means to accomplish this.
- 3. We have reviewed the booklet proposed to be issued as a Reports Management Program Guide for the Office of the Comptroller and find it extremely difficult to read and understand. We recommend that it be reorganized into a simpler format expressing clearly and concisely the actual procedure to be established in the OC. The following specific comments are made:
  - a. Throughout the procedure reference is made to "operating personnel". It is not clear whether the term means (1) those employees who actually compile reports, (2) those employees who have immediate responsibility for reports prepared or required at section or branch level, or (3) Chiefs of Staffs and Divisions where reports are prepared or required.
  - b. Neither forms T-1, 2, and 3, nor the procedure provides for approval of analyses or requests by the Chief of the Staff or Division concerned. On form T-3, Request for Approval of a New or Revised Reporting Requirement, only the name and location of the "person to be contacted" provides information as to the component submitting the request. If the chief of a Staff or Division is to have adequate control of his activity, the analysis forms (T-1 and 2) and the request form (T-3) should be submitted through him.

c. The procedure provides for approval (under certain conditions) of reports other than those used entirely within a component of the OC by the Reports Review Panel. The usual function of a board, committee, or panel is to advise and recommend action to the official to whom it is responsible. The procedure indicates Panel actions as follows:

#### (1) Section II, Installing the Program, Paragraph 1-c.

This indicates that the Fanel's action constitutes approval if unanimous. If not unanimous, the Deputy Comptroller approves.

#### (2) Section II, Installing the Program, Paragraph 2-d-(2).

Indicates that Panel recommendations on reports required for submission outside the OC shall be developed for signature of the Comptroller.

### (3) Section III, Operating the Program, Paragraph 1-c.

Provides for Panel to "approve directives" covering new or revised requirements.

## (h) Section III, Operating the Program, Paragraph 3-d-(2).

Indicates the Panels review constitutes approval if unanimous. If not unanimous, the Deputy Comptroller approves.

# (5) Section U.I. Operating the Program, Paragraph 4-d-(2).

Provides with respect to reappraisal that recommendations on reports prepared for submission outside the OC be for the signature of the Comptroller.

Apparently it is intended that the Panel shall, with respect to reports other than those used entirely within a Staff or Division, approve or recommend as follows:

The Panel shall prepare an appropriate recommendation where the report is required for submission outside the OC and submit it to the Comptroller for approval.

The Panel is authorized to approve all other reports by unanimous agreement among the voting members.

Where the Panel is not in unanimous agreement, the report shall be referred to the Deputy Comptroller for approval.

These seem to be the actions proposed for the Panel regardless of whether it is during installation of the program, operation of the program, or reappraisal of the reports. If this is correct it is obviously possible to eliminate four of the five references to this type of Panel action in the procedure.

However, conditions necessitating creation of a Panel to review existing or proposed reports are not apparent from the material furnished. Since most of the reports required or prepared by the OC will be of an accounting nature, it would be appropriate for the staffwork required to be performed by the Technical Accounting Staff.

Accordingly, we recommend that the Panel be eliminated. If a Panel is to be established we recommend that it be an advisory body and that all approvals be made by the Comptroller or Deputy Comptroller.

- d. Section II-2-b is a guide for analyzing reports as is Appendix B. The materiel in Section II largely duplicates Appendix B except that it is so written as to refer to a review of existing reports. The two could be combined into a single guide.
- e. In Section II-2-e-(6) we suggest change to net savings by taking into account any possible additions resulting from the review.
- f. Section III-2-b "recommends" use of 5 x 8 or 3 x 5 cards. Since this issuance is intended to prescribe a procedure, it should specify the card to be used. Same comment applies to III-2-c and in addition, this paragraph states that the Area Records Officer "may desire" to maintain an alphabetical index. A decision should be reached on this matter and the procedure so written.
- L. The following comments are made with respect to the Appendices.
- provide information as to the frency components required to submit the report. Should provide for submission through the Chief of the Staff or Division submitting the report since he may not agree with statements and opinions submitted by the person analyzing the report.

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b. Form T-2, Prepared Reports Analysis Sheet. Suggest item h be set up in same manner as item 5 on Form T-1. Suggest adding to item 9h the following:

If ensuer is "yes" state reason.

Also, should be submitted through Chief of Staff or Division as stated in "a" above.

- c. Form T-3, Request for Approval of a New of Revised Reporting Requirement. See comment in 3b above.
- d. Appendices F and G, Form Memos Th and 5. These are requests for analysis of reports. In one case it is for "working level" analysis, apparently to be sent both within and outside the CC, and the other is for "re-evaluation" of reports, also apparently to be sent both within and outside the CC. Form Th contemplates the enclosure of some kind of analysis form (probably T-1 or 2) and Form T-5 has the analysis form printed on the reverse. From the point of view of the recipient of the request there will be little difference between a request for working level analysis and re-evaluation and the use of two forms for what is basically the same purpose will be somewhat confusing.
- e. It is suggested that from all these forms there be excluded such expressions as are contained in the following items:
  - Form T-1, Item 3. "Your accurate appraisal ---etc
  - Form T-2, Item 3. This instructs the recipient to be "thorough" in analysis; to "not hesitate" to recommend; and invites "frank" constructive criticism.
    - Item h. Refers to "accurate" appraisal.
    - Item 10. Calls for "frank" appraisal.
  - Form Memo T-5, (back), Item 21. Again calls for "frank" appraisal and goes on to say "Your opinion will bear considerable weight".

It is doubtful that appraisal will be improved by requests for "accurate" and "frank" appraisals. As a metter of fact, an invitation for "frank" comments might easily lead to the submission of personal opinions which represent a private rather than an official point of view.

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The statement about an opinion bearing considerable weight would be altogether out of place where a component's interest in a report is obviously minor.

- 5. To summarize, we recommend that:
  - a. A reports management program be established.
  - b. Provision be made for reports control symbols.
- c. The procedure be revised into a simpler format and written in the third person.
- d. Clarification be made as to reporting levels (operating personnel).
- e. Provision be made for approval of Staff and Division chiefs on forms emanating from their components.
- f. The proposed Review Panel be eliminated or, if this recommendation is not approved, then establishment of the Review Panel as an advisory body.
- g. Provision be made for approval by the Comptroller or Deputy Comptroller except for reports for use entirely within a component.
- n. Consolidation of the Guide for Analyzing Reports into one document.
- i. Certain minor procedural determinations be made (see 3f above).
  - j. Certain minor changes be made in the Forms (see h above).

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